



U.S. Department of Justice

United States Attorney
 Southern District of New York

The Silvio J. Mollo Building
 One Saint Andrew's Plaza
 New York, New York 10007

April 5, 2023

VIA ECF

The Honorable Laura Taylor Swain
 Chief United States District Judge
 Southern District of New York
 500 Pearl Street
 New York, New York 10007

MEMO ENDORSED

Re: *United States v. Liu et al.*, 21 Cr. 592 (LTS)

Dear Chief Judge Swain:

The Government writes on behalf of the parties to respectfully request an approximately 60-day adjournment of the conference in this case currently scheduled for April 12, 2023. To date, two of the defendants in this case have entered guilty pleas (defendant Mohamed Elmandouh and defendant Henler Datu Tahil). The Court recently scheduled a change of plea hearing for another defendant (defendant Noemi Algodon). The Government recently extended plea offers to several of the remaining defendants. The adjournment requested herein will allow additional time to continue and in at least some instances likely complete discussions concerning potential pretrial resolutions. It will also allow time for continued review of the substantial discovery in this case.

If the Court grants this request, the Government further requests that the Court exclude time under the Speedy Trial Act between April 12, 2023, and the new conference date set by the Court. The ends of justice served by granting such an exclusion outweigh the best interest of the public and the defendants in a speedy trial, pursuant to 18 U.S.C. § 3161(h)(7)(A). An exclusion is warranted to allow additional time for the defendants to review discovery and for the parties to engage in discussions of potential pretrial resolutions of this case. The defendants consent to this request.

The foregoing request for adjournment is granted. The pretrial conference is hereby rescheduled to June 16, 2023, at 11:30 a.m. The Court finds pursuant to 18 U.S.C. § 3161(h)(7)(A) that the ends of justice served by an exclusion of the time from speedy trial computations from today's date through June 16, 2023, outweigh the best interests of the public and the defendants in a speedy trial for the reasons stated above. DE#139 resolved. SO ORDERED.

April 5, 2023
 /s/ Laura Taylor Swain, Chief USDJ

Respectfully submitted,

DAMIAN WILLIAMS
 United States Attorney

By:
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 Assistant United States Attorney
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cc: Defense counsel listed on ECF